

Exhibit D



FDA Testing Result Investigation August 1, 2019

Confidential Business Information – Not Subject to Freedom of Information Act



Agenda



- Earth's Best Background
- Earth's Best Rice Cereal Manufacturing
 - Components
 - Supply Chain
- Organic Brown Rice Flour Testing History
- Investigation of FDA Results
- Hain Action Items and Next Steps

Understanding the Earth's Best Mission



We have been cultivating the organic movement for more than 30 years, from responsibly raised protein to sustainably sourced purees. All this with the goal of making better food available to more moms.



At Earth's Best we believe that
Organic Baby Food is a **RIGHT**, not a privilege.



Earth's Best Portfolio Overview: Birth to Backpack



Formula

Diapers

Cereal

Jars

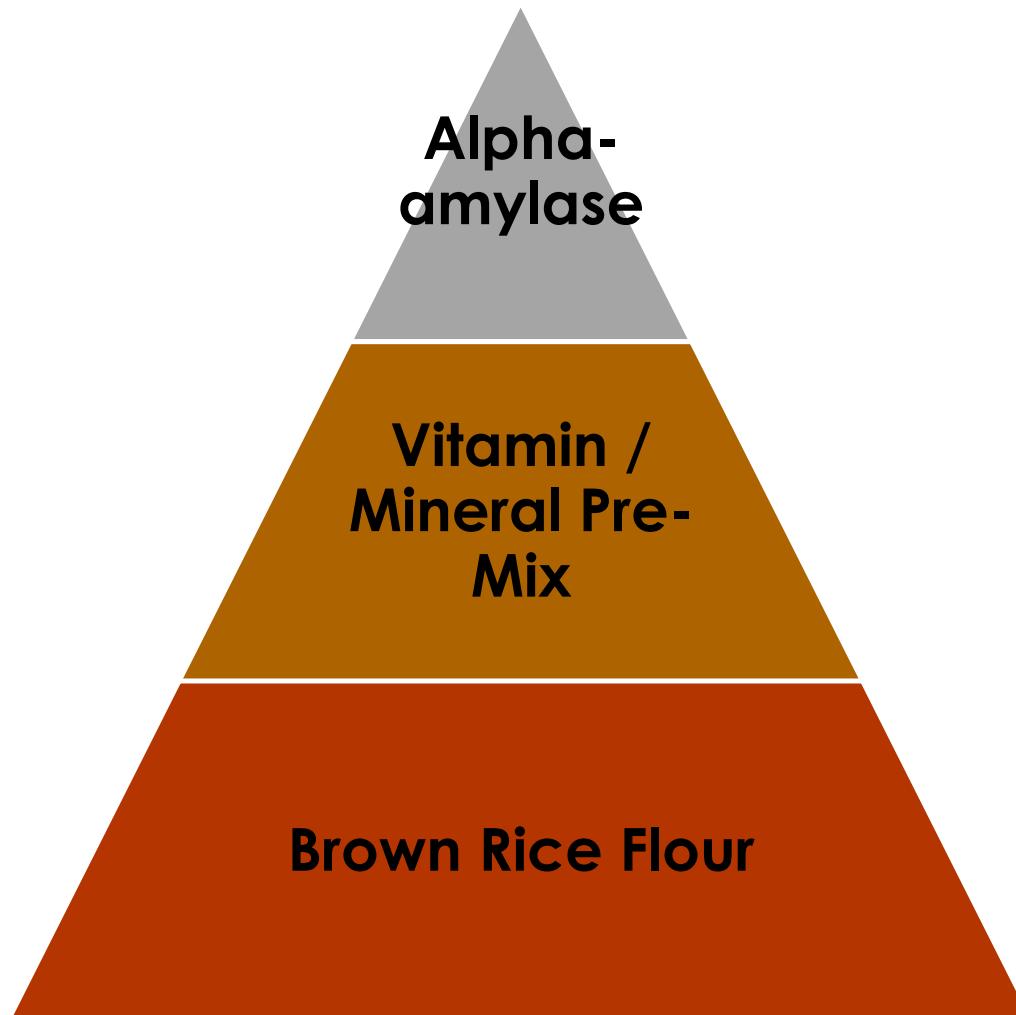
Pouches

Toddler
Pouches

Snacks

Meals

Earth's Best Organic Brown Rice Cereal



- Testing focused on Brown Rice Flour
 - Ingredient Hazard Analysis
 - High Risk of Arsenic presence
 - Dominance in formula (~98%)
 - Sourcing region
- Partnership with key Brown Rice supplier
 - 5+ years
 - Training on food safety management principles throughout the supply chain
 - Strong sustainability programs

Processing and Testing of Rice Cereal



Rice Receipt & Water Inbound

- Tested at Eurofins

Paddy Parboiling

- Tested at Eurofins

Milling & Packaged

- Pre-shipment Samples tested by Hain at Eurofins

Flour Receipt by Hain

- Supply Chain PC
- Based on test results & COA

Processed into Baby Cereal

- WIP Batch
- Packaged

Organic Brown Rice Flour Testing History



➤ Brown Rice Flour spec revised based on FDA Guidance in 2016

- Decreased pre-shipment acceptance due to Arsenic
- Decrease in average amount of Arsenic found in pre-shipment samples

Arsenic Spec Compliance	# Samples Evaluated	Arsenic Spec Acceptance Rate	Avg Arsenic In Spec Samples
Pre-Guidance (2015-2016)	88	98%	98.5 ppb
Post-Guidance (2016-2019)	142	82%	69.3 ppb

Note: Actual Acceptance Rates are lower; these exclude rejections for non-Arsenic related issues

Investigation of FDA Results By Lot Code



FDA Data					Estimate % Avg FG Increase from Avg Raw	Track & Trace Data						
FDA Sample Number	Best By Date	Lot number	FDA FG Inorganic Arsenic (ppb)	Avg FG Result		Packaging Date	WIP Batch	Rice Flour Lot #s	Type of Arsenic Test	Raw Material Results (ppb)	Avg Raw Result	
1017814	3/2/19	BN A 0636	94	80.3	43%	9/8/17	199987	B160004661	Total Arsenic	54	56.3	
1038929		BN C 1139	83					B160004870	Total Arsenic	58		
1039633		BN F 1648	64					B160004759	Total Arsenic	57		
1039750	3/8/19	BN E	74	74.0	29%	9/14/17	200408	B160004871	Total Arsenic	60	57.3	
1041752	3/20/19	BN G	92	96.0	57%	9/26/17	200651	B160005149	Total Arsenic	65	61.3	
1037933		BN E 1536	67					B160004873	Total Arsenic	58		
1041751	3/21/19	BN B 0832	108			9/27/17		B160005157	Total Arsenic	62		
1038677		BN B 0932	116					B160004871	Total Arsenic	60		
1026932		BN D 1248	97					B160005148	Total Arsenic	61	59.0	
1044380	4/11/19	BH C	100	100.0	69%	10/18/17	201873	B160004872	Total Arsenic	55		
1024309	4/27/19	BN I 2216	129	129.0	93%	11/3/17	204146	B160005152	Total Arsenic	61	67.0	
1024210	6/6/19	BN I 2241	94	101.0	61%	12/13/17		B160005305	Total Arsenic	69		
547103		BN I 2339	115			12/14/17		B160005306	Total Arsenic	76		
1013927	6/7/19	BN E 1540	92			12/15/17		B160005512	Total Arsenic	62	62.7	
1026516		BN H 2123	104			12/20/17		B160005152	Total Arsenic	61		
1074288	6/8/19	BNE 1406	105			B160005515		Total Arsenic	63			
1035738	6/13/19	BN J 0000	96			B160005513		Total Arsenic	60			
1047511	6/27/19	BNC 1142	100	100.0	56%	1/3/18	208226	B160005150	Total Arsenic	65	64.0	
1063061	7/19/19	BN J	115	115.0	43%	1/25/18	208594	B160006189	Inorganic Arsenic	81	80.5	
1027437	8/18/19	BN A 0703	97	97.0	28%	2/24/18	210374	B160006191	Inorganic Arsenic	80		
784399	11/23/19	BN K 0305	108	108.0	31%	6/1/18	215305	B160006265	Inorganic Arsenic	77	75.7	
								B160006263	Inorganic Arsenic	74		
								B160006260	Inorganic Arsenic	76		
								B160007235	Inorganic Arsenic	66		
								B160006755	Inorganic Arsenic	99	82.5	

- Variation amongst Finished Good manufacturing date results
- Brown Rice Flour testing results do not appear to be correlated to finished good results data
- Preliminary investigation indicates Vitamin/Mineral Pre-Mix may be a major contributing factor
- Hain is committed to revalidating all components and processing steps to meet FDA guidance

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Action Items



- **Review entire supply chain testing and methodologies**
- **Validate minor ingredients impact to Food Safety Plan Hazard Analysis**
- **Explore alternatives for Brown Rice ingredient to reduce risk**
- **Revalidation of processing impact on finished goods**



Appendix

Laboratory Methodology Capabilities



- **Eurofins – current testing lab**

Arsenic Speciation by IC/ICP-MS (AS_SPEC_S)

Arsenobetaine represents unretained organic arsenic species. Sums represent the quantifiable results plus the estimated results of any species below LOQ.

Food Integrity Innovation-Madison

FDA Elemental Analysis Manual [Internet]. Silver Spring (MD): Food and Drug Administration (US); Section 4.11 [Version 1.1; 2012 November]. Arsenic Speciation in Rice and Rice Products Using High Performance Liquid Chromatography-Inductively Coupled Plasma-Mass Spectrometric Determination.

Kutscher, D., McSheehy, S., Wills, J., Jensen, D., “IC-ICP-MS Speciation Analysis of As in Apple Juice using the Thermo Scientific iCAP Q ICP-MS.” Thermo Scientific Application Note 43099, (2012).

- **Covance – Lab purchased by Eurofins, previously NFL**

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Covance Laboratories - Madison

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Laboratory Methodology Capabilities



- **Certified Labs - historic lab**

- Total Arsenic

ARSENIC (ICP-MS)

120 ppb

ICP-MS, FDA EAM 4.7

- Speciation of Arsenic

ARSENIC SPECIATION

AS (III)

85 ppb

EAM: SEC 4: ARSENIC

AS (V)

35 ppb

EAM: SEC 4: ARSENIC

TOTAL INORGANIC

120 ppb

EAM: SEC 4: ARSENIC

DIMETHYLLARSINIC ACID - DMA

<25 ppb

EAM: SEC 4: ARSENIC

MONOMETHYLARSONIC ACID

<25 ppb

EAM: SEC 4: ARSENIC

TOTAL ORGANIC

<25 ppb

EAM: SEC 4: ARSENIC

- **Deibel Labs – approved back-up lab**

- Total Arsenic

Arsenic

0.098 ppm

ICP-MS

PE-2118

- Speciation of Arsenic

Arsenic Inorganic ICP (ppb)

95 ppb

IC-ICP-MS

n/a